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July 30, 2019

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Hon. William F. Kuntz
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
Dear Judge Kuntz,

Re: United States v. Juraboev, et.al.,
Azizjon Rakhmatov, defendant
15-95 WFK

This letter requests, with the consent of the government, the Court's authorization to defense counsel for codefendants Rakhmatov and Kazimov in the above referenced case, to share the motions they have filed under seal on each defendant's behalf. The authorization, pursuant to the Court's protective order of October 3, 2017, would cover the motions drafted by counsel and any attached exhibits, other than affidavits by government agents or other materials prepared by the government.

Defendants are joined for trial, therefore their individual defenses and strategies must take into account those of the codefendant, lest prejudice to due process fair trial rights ensue.

Motions referring to classified materials would be shared pursuant the specialized delivery procedures applicable to them.

It is submitted that the Court's endorsement on this letter would suffice to direct the parties.

Thank you for your attention.

Respectfully,

S/Lawrence Mark Stern
LAWRENCE MARK STERN
Attorney for Azizjon Rakhmatov

cc: Elizabeth Macedonio
Kelley Sharkey

Attorneys for defendant Kasimov

David Kessler, AUSA
Douglas Pravda, AUSA